

RECEIVED
2003 DEC 15 AM 10:18
BELLSOUTH®

BellSouth Telecommunications, Inc.
Suite 2101
333 Commerce Street
Nashville, TN 37201-3300
guy.hicks@bellsouth.com

T.R.A. DOCKET ROOM
Guy M. Hicks
General Counsel
615 214-6301
Fax 615 214-7406

December 12, 2003

VIA HAND DELIVERY

Hon. Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Implementation of the Federal Communications Commission's Triennial
Review Order (Nine-month Proceeding)(Switching)*
Docket No. 03-00491

Dear Chairman Tate:

Enclosed are the original and fourteen copies of the non-proprietary portions of BellSouth's Third Supplemental Responses to AT&T's discovery propounded in this docket. Proprietary portions of the responses are being filed under separate cover pursuant to the Protective Order adopted on November 21, 2003. Copies of the enclosed are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch

BEFORE THE TENNESSEE REGULATORY AUTHORITY

In Re:)
) Docket No. 03-00491
IMPLEMENTATION OF THE FEDERAL)
COMMUNICATIONS COMMISSION'S)
TRIENNIAL REVIEW ORDER – 9)
MONTH PROCEEDING – SWITCHING)

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES TO
AT&T COMMUNICATIONS OF THE SOUTH CENTRAL
STATES, LLC'S
FIRST SET OF INTERROGATORIES**

BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits the following First Supplemental Responses to the First Set of Interrogatories served by AT&T Communications of the South Central States, LLC's ("AT&T") dated October 27, 2003 and states as follow:

BellSouth incorporates herein by reference all of its general and specific objections filed on November 6, 2003. Any responses provided by BellSouth in response to this discovery will be provided subject to and without waiving any of BellSouth's previously filed objections

SUPPLEMENTAL RESPONSES TO INTERROGATORIES

REQUEST: Provide the number and percentage of access lines, by calendar year (for 2000-2003) and by CO (by applicable CLLI code) in BellSouth's nine-state region that serve:

- (a) small business lines; and
- (b) residential lines.

SUPPLEMENTAL RESPONSE:

- (a) On November 20, 2003, AT&T clarified that the term "small business lines" refers to lines that are DS0/2-wire analog loops. With this clarification, BellSouth states that information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 21, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.
- (b) The information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 21, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority

Docket No. 03-00491

AT&T's 1st Interrogatories

October 27, 2003

SUPPLEMENTAL RESPONSE Item No. 22

Page 1 of 1

REQUEST: Provide, by CO, or the next most granular analysis available, the most currently available average revenue per access line for small business lines and average revenue per access line for residential lines.

SUPPLEMENTAL RESPONSE:

BellSouth objects to this Interrogatory on the grounds that information concerning BellSouth's retail revenues is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Subject to this objection, and without waiving this objection, BellSouth states the information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 22, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.

BellSouth Telecommunications, Inc.

Tennessee Regulatory Authority

Docket No. 03-00491

AT&T's 1st Interrogatories

October 27, 2003

SUPPLEMENTAL RESPONSE Item No. 56

Page 2 of 2

- (e) The information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 56, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.
- (f) BellSouth is unable to gather the information responsive to this request for business customers broken down by number of lines. See BellSouth's response to sub-part (b) for the total number of business access lines.

REQUEST: For the most recent quarter for which information is available, please provide by applicable CLLI code, the total number of retail access lines (voice grade equivalents) (VGEs) provided by BellSouth, as well as the number in each of the following categories:

- (a) residential;
- (b) business;
- (c) Centrex;
- (d) PBX;
- (e) Public; and
- (f) Small business premises with four or more analog switched lines.

SUPPLEMENTAL RESPONSE:

- (a) The information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 56, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.
- (b) The information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 56, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.
- (c) The information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 56, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.
- (d) The information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 56, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U. BellSouth Telecommunications, Inc.

BellSouth Telecommunications, Inc.

Tennessee Regulatory Authority

Docket No. 03-00491

AT&T's 1st Interrogatories

October 27, 2003

SUPPLEMENTAL RESPONSE Item No. 56

Page 2 of 2

- (e) The information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 56, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.
- (f) BellSouth is unable to gather the information responsive to this request for business customers broken down by number of lines. See BellSouth's response to sub-part (b) for the total number of business access lines.

REQUEST: On a wire center basis, please provide average local revenue per small business line and average local revenue per residential line. Please provide average "take rate" for vertical features.

SUPPLEMENTAL RESPONSE:

See BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 22 for the average local revenue per small business and residential line.

BellSouth does not maintain the information requested for vertical features on a wire-center basis. However, in an effort to be responsive, BellSouth states that the information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 110, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.

REQUEST: Please provide disaggregated revenue data (residential, small business, large business, etc.) specific to the geographies that BellSouth claims are markets for impairment analysis purposes.

SUPPLEMENTAL RESPONSE:

The appropriate markets that should be used to conduct the impairment analysis test are the UNE rate zones previously identified by this Commission, subdivided by Component Economic Areas (CEA) established by the Bureau of Economic Analysis of the Department of Commerce. BellSouth does not maintain disaggregated revenue data for its retail customers based on these markets. However, BellSouth states that the information responsive to this request is proprietary and is in AT&T's possession, custody, or control as it was provided in BellSouth's Third Supplemental Response to AT&T's First Set of Interrogatories, Item No. 22, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17749-U.

Respectfully submitted, this 15th day of December, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

Guy Hicks
Joelle J. Phillips
333 Commerce Street, Suite 2101
Nashville, TN 37201-3300
(614) 214-6301

R. Douglas Lackey
Andrew D. Shore
Meredith E. Mays
Suite 4300, BellSouth Center
675 W. Peachtree St., NE
Atlanta, GA 30375
(404) 335-0750

518026

BEFORE THE TENNESSEE REGULATORY AUTHORITY

In Re:)
) Docket No. 03-00491
IMPLEMENTATION OF THE FEDERAL)
COMMUNICATIONS COMMISSION'S)
TRIENNIAL REVIEW ORDER – 9)
MONTH PROCEEDING – SWITCHING)

**BELLSOUTH TELECOMMUNICATIONS, INC.'S FIRST SUPPLEMENTAL
RESPONSES TO AT&T COMMUNICATIONS OF THE SOUTH CENTRAL
STATES, LLC'S FIRST REQUEST FOR PRODUCTION**

BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits the following First Supplemental Responses to the First Set of Requests for Production served by AT&T Communications of the South Central States, LLC's ("AT&T") dated October 27, 2003 and states as follow:

BellSouth incorporates herein by reference all of its general and specific objections filed on November 6, 2003. Any responses provided by BellSouth in response to this discovery will be provided subject to and without waiving any of BellSouth's previously filed objections

SUPPLEMENTAL RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST: Provide a copy of BellSouth's Network Centers Force Sizing Model Process and Force Models, and all associated instructions.

SUPPLEMENTAL RESPONSE:

Responsive documents are being provided. See documents titled "FCSTFLOW.ppt", 2004 CWINS Force Models, 2004 LCSC Force Models, for a flow chart of the above-mentioned process. The documents are proprietary and are being provided pursuant to the terms of the parties' protective agreement.

The force model used to determine the filed installation and central office work force required to work the load associated with the UNE-P to UNE-L conversions is proprietary. This information is in AT&T's possession, custody, or control as it was provided by BellSouth in response to AT&T's Second Request for Production, Item No. 35, pursuant to the protective agreement in Florida Public Service Commission Docket No. 030851-TP.

REQUEST: Provide any and all market surveys conducted or other documents and information reviewed by BellSouth that discuss or address:

- (a) Pricing strategies of competitors offering local switching.
- (b) Product descriptions of competitors' offerings of local switching for mass-market customers.
- (c) Demand elasticity for local switching.
- (d) Demand projections related to the market for local switching.
- (e) Marketing strategies used by competitors offering local switching to serve mass-market customers.

SUPPLEMENTAL RESPONSE:

BellSouth objects to this request on grounds that it is overly broad and unduly burdensome to the extent that it seeks "documents and information" reviewed by anyone at BellSouth. Subject to this objection, and without waiving this objection, documents responsive to this request are available via the following URL link:

<http://bellsouthcorp.com/policy/triennialreview/filings/2003-12-12/>

The document is titled: GA_17749-U_BST_SUPP_TO_ATT_1_POD.PDF

Respectfully submitted, this 12th day of December, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

Guy Hicks
Joelle J. Phillips
333 Commerce Street, Suite 2101
Nashville, TN 37201-3300
(614) 214-6301

R. Douglas Lackey
Andrew D. Shore
Meredith E. Mays
Suite 4300, BellSouth Center
675 W. Peachtree St., NE
Atlanta, GA 30375
(404) 335-0750

518052

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2003, a copy of the foregoing document was served on the parties of record, via the method indicated:

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Henry Walker, Esquire
Boult, Cummings, et al.
414 Union Street, #1600
Nashville, TN 37219-8062
hwalker@boultcummings.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Charles B. Welch, Esquire
Farris, Mathews, et al.
618 Church St., #300
Nashville, TN 37219
cwelch@farrismathews.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Martha M. Ross-Bain, Esquire
AT&T
1200 Peachtree Street, Suite 8100
Atlanta, Georgia 30309
rossbain@att.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Timothy Phillips, Esquire
Office of Tennessee Attorney General
P. O. Box 20207
Nashville, Tennessee 37202
timothy.phillips@state.tn.us

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

H. LaDon Baltimore, Esquire
Farrar & Bates
211 Seventh Ave. N, # 320
Nashville, TN 37219-1823
don.baltimore@farrar-bates.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

James Wright, Esq.
United Telephone - Southeast
14111 Capitol Blvd.
Wake Forest, NC 27587
james.b.wright@mail.sprint.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Ms. Carol Kuhnnow
Qwest Communications, Inc.
4250 N. Fairfax Dr.
Arlington, VA 33303
Carol.kuhnnow@qwest.com

Jon E. Hastings, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062
jhastings@boultcummings.com

Dale Grimes, Esquire
Bass, Berry & Sims
315 Deaderick St., #2700
Nashville, TN 37238-3001
dgrimes@bassberry.com

Mark W. Smith, Esquire
Strang, Fletcher, et al.
One Union Square, #400
Chattanooga, TN 37402
msmith@sf-firm.com

Nanette S. Edwards, Esquire
ITC^DeltaCom
4092 South Memorial Parkway
Huntsville, AL 35802
nedwards@itcdeltacom.com

Guilford Thornton, Esquire
Stokes & Bartholomew
424 Church Street, #2800
Nashville, TN 37219
gthornton@stokesbartholomew.com

Marva Brown Johnson, Esquire
KMC Telecom
1755 N. Brown Road
Lawrenceville, GA 30043
marva.johnson@kmctelecom.com

- ☐ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight
- ☒ Electronic

Ken Woods, Esquire
MCI WorldCom
6 Concourse Parkway, #3200
Atlanta, GA 30328
Ken.woods@mci.com


